IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC.,)
Plaintiff,) REDACTED PUBLIC VERSION
v.) C.A. No. 04-1371-JJF
FAIRCHILD SEMICONDUCTOR INTERNATIONAL, INC., and FAIRCHILD SEMICONDUCTOR CORPORATION,)))
Defendants.)

DECLARATION OF VICKIE FEEMAN IN SUPPORT OF FAIRCHILD'S ANSWERING BRIEFS IN OPPOSITION TO POWER INTEGRATIONS' MOTION FOR A DECLARATION THAT THIS CASE IS EXCEPTIONAL, TREBLE DAMAGES, AND ATTORNEYS' FEES

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Dated: December 21, 2007

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a Delaware corporation,

C.A. No. 04-1371-JJF

Plaintiff,

٧.

FAIRCHILD SEMICONDUCTOR INTERNATIONAL, INC., a Delaware corporation, and FAIRCHILD SEMICONDUCTOR CORPORATION, a Delaware corporation

Defendants.

DECLARATION OF VICKIE FEEMAN IN SUPPORT OF FAIRCHILD'S ANSWERING BRIEFS IN OPPOSITION TO POWER INTEGRATIONS' MOTION FOR A DECLARATION THAT THIS CASE IS EXCEPTIONAL, TREBLE DAMAGES, AND ATTORNEYS' FEES

- I, Vickie Feeman, the undersigned, declare as follows:
- 1. I am an attorney with the firm of Orrick, Herrington & Sutcliffe LLP, counsel of record for Defendants Fairchild Semiconductor International, Inc. and Fairchild Semiconductor Corp. (collectively, "Fairchild"). I am admitted to the Bar of the State of California. I make this declaration in support of Fairchild's Answering Briefs in Opposition To Power Integrations' Motions For A Declaration That This Case Is Exceptional, Treble Damages, And Attorneys' Fees. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.
- 2. Power Integrations filed this action against Fairchild on October 20, 2004. On February 11, 2005, I traveled from Menlo Park, California to Bucheon, Korea with a litigation team, arriving in Korea on February 12, 2005. This team consisted of myself, along with two Korean-speaking associates, a paralegal and a computer technician. The personnel accompanying me to Korea were: Raymis Kim, Jae Kim, Sarah Schultz and Vera Yin.

- 3. The team spent a full two weeks in Korea, meeting with Fairchild Korea executives, engineers, marketing and sales personnel in order to investigate Power Integrations' infringement claims. We reviewed and gathered all potentially relevant and responsive documents and other materials, including data sheets, schematics, drawings, patents and correspondence. As almost 100% of these documents were in Korean, this was an enormous and arduous task.
- Although I had to depart for the United States on February 25, 2005, the 4. remainder of the team stayed in Korea for an additional two days, meeting with more Fairchild people and collecting additional documents. The rest of the team departed Korea for the United Duties on a Contain 2/, 2005.
- Further, Fairchild consented to the depositions of Korean non-party witnesses. 5. These witnesses were made available to Power Integrations despite the fact that Power Integrations never named Fairchild Korea as a party to this lawsuit. In addition, Fairchild never required that Power Integrations comply with the requirements of the Hague Convention with respect to any foreign discovery.
- Depositions were held in Korea for two weeks, beginning on September 1, 2005 6. and concluding on September 13, 2005. Fairchild agreed that Power Integrations could depose every non-party witness for more than a day each, affording Power Integrations the opportunity to spend nine (9) days deposing six (6) witnesses. Thus, Fairchild again dispatched two attorneys to Korea to cover these depositions, all of which occurred via translators. Again, I attended these depositions, along with Raymis Kim from my office.

I declare the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Executed on December 21, 2007 in Menlo Park, California.